

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE**

JONES, et al.,

Plaintiffs,  
v.

VARSITY BRANDS, LLC, et al.,

Defendants.

**Case No. 2:20-cv-02892-SHL-tmp**

**MOTION FOR ONE WEEK STAY PENDING SETTLEMENT**

Defendants hereby move the Court for a one-week stay of all proceedings. Good cause exists for such a stay because following formal mediation with the aid of an experienced mediator, Defendants accepted a monetary offer by the Plaintiffs to settle the case and the parties are trading drafts on certain non-monetary terms.

However, trial in this matter is scheduled to begin in three months, and finalizing the remaining details of a settlement is challenging in an environment where there are multiple pre-trial exchange deadlines looming, material motions pending before the Court, and additional motions and filings that are being considered by the parties. Defendants accordingly move the Court to stay all proceedings in the case (or otherwise hold such proceedings in abeyance) until April 1, 2024, by which time Defendants expect that any remaining issues will be resolved.

A one-week standstill in the proceedings will not require any adjustment to the trial schedule or other deadlines that have been so ordered by the Court.

Defendants have attempted to confer with Plaintiffs on this motion several times, but have not received a response, as described in the attached certificate of consultation.

The Defendants alternatively request a status conference to discuss these issues with the Court.

Dated: March 25, 2024

s/ Christopher Tayback

Michael D. Bonanno\*  
Ryan T. Andrews\*  
QUINN EMANUEL URQUHART AND SULLIVAN, LLP  
1300 I Street NW, Suite 900  
Washington, D.C. 20005  
Phone: (202) 538-8000  
Fax: (202) 538-8100  
[mikebonanno@quinnmanuel.com](mailto:mikebonanno@quinnmanuel.com)  
[ryanandrews@quinnmanuel.com](mailto:ryanandrews@quinnmanuel.com)

Christopher Tayback\*  
QUINN EMANUEL URQUHART AND SULLIVAN, LLP  
865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
Phone: (231) 443-3000  
Fax: (231) 443-3100  
[christayback@quinnmanuel.com](mailto:christayback@quinnmanuel.com)

\* Admitted pro hac vice

Matthew S. Mulqueen (TN #28418)  
Adam S. Baldridge (TN #23488)  
BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ  
165 Madison Avenue, Suite 2000  
Memphis, TN 38103  
Phone: (901) 526-2000  
Fax: (901) 577-0866  
[mmulqueen@bakerdonelson.com](mailto:mmulqueen@bakerdonelson.com)  
[abaldridge@bakerdonelson.com](mailto:abaldridge@bakerdonelson.com)

*Attorneys for Defendants Bain Capital Private Equity, LLC, Bain Capital Fund XII, L.P., Bain Capital Fund (DE) XII, L.P., and Bain Capital Fund (Lux) XII, SCSp*

s/ George S. Cary

George S. Cary\*

CLEARY GOTTLIEB STEEN & HAMILTON LLP  
2112 Pennsylvania Avenue, NW  
Washington, DC 20037  
Phone: (202) 974-1500  
gcarry@cgsh.com

Matthew S. Mulqueen (TN #28418)  
Adam S. Baldridge (TN #23488)  
BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ  
165 Madison Avenue, Suite 2000  
Memphis, TN 38103  
Phone: (901) 526-2000  
mmulqueen@bakerdonelson.com  
abaldridge@bakerdonelson.com

*Attorneys for Defendants Varsity Brands, LLC, Varsity Spirit, LLC; and Varsity Spirit Fashions & Supplies, LLC*

s/ Nicole Berkowitz Riccio

Grady Garrison (TN #008097)  
Nicole Berkowitz Riccio (TN #35046)  
BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ  
165 Madison Avenue, Suite 2000  
Memphis, TN 38103  
Phone: (901) 526-2000  
ggarrison@bakerdonelson.com  
nriccio@bakerdonelson.com

*Attorneys for U.S. All Star Federation, Inc.*

s/ Brendan P. Gaffney

Paul E. Coggins\*  
Brendan P. Gaffney\*  
LOCKE LORD LLP  
2200 Ross Avenue, Suite 2800  
Dallas, TX 75201  
Phone: (214) 740-8000  
Fax: (214) 740-8800  
pcoggins@lockelord.com  
bgaffney@lockelord.com

\* Admitted *pro hac vice*

Edward L. Stanton III (TN #018904)

S. Keenan Carter (TN #023386)  
BUTLER SNOW LLP  
6075 Poplar Avenue, Suite 500  
Memphis, Tennessee 38119  
Phone: (901) 680-7336  
Fax: (901) 680-7201  
[Edward.Stanton@butlersnow.com](mailto:Edward.Stanton@butlersnow.com)  
[Keenan.Carter@butlersnow.com](mailto:Keenan.Carter@butlersnow.com)

*Attorneys for Jeff Webb*

/s/ Richard G. Parker

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Scott A. Edelman\*  
Fiona A. Schaeffer\*  
Katherine K. Fell\*  
55 Hudson Yards,  
New York, NY 10001  
Phone: (212) 530-5000  
Fax: (212) 530-5219  
[sedelman@milbank.com](mailto:sedelman@milbank.com)  
[fschaeffer@milbank.com](mailto:fschaeffer@milbank.com)  
[kfell@milbank.com](mailto:kfell@milbank.com)

Richard G. Parker\*  
1850 K. Street, N.W.  
Washington, DC 20006  
Phone: (202) 835-7500  
Fax: (202) 263-7586  
[rparker@milbank.com](mailto:rparker@milbank.com)

\* Admitted pro hac vice

MARTIN, TATE, MORROW & MARSTON, P.C.  
Shea S. Wellford (TN #16947)  
International Place, Tower II  
6410 Poplar Ave., Ste. 1000  
Memphis, TN 38119  
Phone: (901) 522-9000  
Fax: (901) 527-3746  
[sheawellford@martintate.com](mailto:sheawellford@martintate.com)

*Attorneys for Charlesbank Capital Partners, LLC, Charlesbank Equity Fund VII, LP,  
Charlesbank Equity Fund VIII, LP, and Charlesbank Equity Fund IX, LP*

**CERTIFICATE OF CONSULTATION UNDER LOCAL RULE 7.2(a)(1)(B)**

I hereby certify that beginning on Wednesday, March 20, counsel for various of the Defendants have called and sent emails to Plaintiffs' counsel regarding notifying the Court of the status of settlement in order to hold ongoing proceedings in abeyance while the parties work out the final written agreement memorializing their settlement. On March 22, the undersigned Defendants' counsel advised lead Plaintiffs' counsel by email that Defendants intended to file this Motion on March 25 absent a response from Plaintiffs regarding the request to notify the Court of the status of settlement. On March 23, the undersigned Defendants' counsel sent Plaintiffs' counsel a copy of this motion seeking their assent and again stating that it would be filed on March 25, absent a response. Plaintiffs' counsel has not responded with a position on the relief requested in this motion.

s/ Christopher Tayback  
Christopher Tayback